

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
CRIMINAL DIVISION  
VENUE: SAN FRANCISCO

FILED  
05 MAY 11 PM 1:41  
RICHARD W. WILKINS  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
v.

ELTAIB YOUSIF

CR 05 00305

WHA

DEFENDANT.

## INDICTMENT

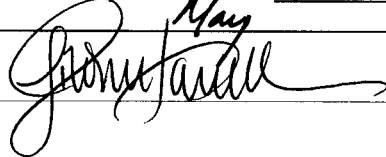
18 U.S.C. § 1960- Operating Illegal Money Transmitting Business

A true bill.



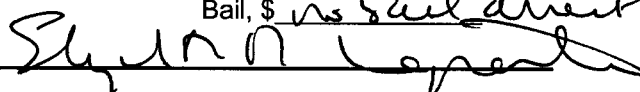
Foreman

Filed in open court this 11<sup>th</sup> day of

May  


Clerk

Bail, \$

no bail amount wanted  


WHA

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING
**OFFENSE CHARGED**
 18 U.S.C. § 1960 - Operating Illegal Money  
 Transmitting Business

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony
**PENALTY:**
 5 years imprisonment  
 \$250,000 fine  
 1 year supervised release  
 \$100 special assessment
**PROCEEDING**
 Name of Complainant Agency, or Person (& Title, if any)  
 Immigration and Customs Enforcement,  
 SA Kevin Terrel

☐ person is awaiting trial in another Federal or State  
 Court, give name of court

☐ this person/proceeding is transferred from another  
 district per (circle one) FRCrP 20, 21 or 40. Show  
 District

PE

☐ this is a re-prosecution of  
 charges previously dismissed  
 which were dismissed on  
 motion of:

☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a  
 pending case involving this same  
 defendant

☐ prior proceedings or appearance(s)  
 before U.S. Magistrate regarding  
 this defendant were recorded under
SHOW  
DOCKET NO.MAGISTRATE  
CASE NO.
 Name and Office of Person  
 Furnishing Information on  
 THIS FORM

KEVIN V. RYAN

☒ U.S. Att'y ☐ Other U.S. Agency

 Name of Asst. U.S. Att'y  
 (if assigned)

ROBIN HARRIS

 Name of District Court, and/or Judge/Magistrate Location  
 NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

ELTAIB YOUSIF

DISTRICT COURT NUMBER

**CR 05 00305**

DEFENDANT

**IS NOT IN CUSTODY**

- 1) ☒ Has not been arrested, pending outcome this proceeding.  
 If not detained give date any prior summons  
 was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

 Has detainer  
 been filed?

☐ Yes  
☐ No

 If "Yes"  
 give date  
 filed

**DATE OF  
 ARREST**

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

Month/Day/Year

**DATE TRANSFERRED  
 TO U.S. CUSTODY**
☐ This report amends AO 257 previously submitted
**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**
☐ SUMMONS ☐ NO PROCESS\*

☒ WARRANT Bail Amount: No Bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

*\*Where defendant previously apprehended on complaint, no new summons  
 or warrant needed, since Magistrate has scheduled arraignment*

Date/Time:

Before Judge:

Comments:

FILED  
05 MAY 11 PM 1:44  
CLERK OF U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

KEVIN V. RYAN (CSBN 118321)  
United States Attorney

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WHA

**CR 05 00305**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ELTAIB YOUSIF,

Defendant.

No.

VIOLATIONS: 18 U.S.C. § 1960 --  
Operating Illegal Money Transmitting  
Business

SAN FRANCISCO VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE: (18 U.S.C. § 1960 -- Operating Illegal Money Transmitting Business)

Between on or about and between September 26, 2001 and November 5, 2003, in the  
Northern District of California and elsewhere, the defendant,

ELTAIB YOUSIF,

did knowingly conduct, control, manage, supervise, direct, and own an unlicensed money  
transmitting business which affected interstate and foreign commerce, by causing the transfer of  
approximately \$1,500,000 by wire to persons and entities outside the United States without a

INDICTMENT

1 money transmitting license, as required by California Financial Code Section 1800.3(a), in  
2 violation of Title 18, United States Code, Section 1960.

3  
4 DATED: May 11<sup>th</sup>, 2005

A TRUE BILL.

5  
6   
FOREPERSON

7  
8 KEVIN V. RYAN  
United States Attorney

9  
10   
EUMIL L. CHOI  
11 Chief, Criminal Division

12 (Approved as to form: Harris)  
13 AUSA HARRIS